



16711/OSV
D8(m) Policy ltr 09-2001
5 July 2001

From: Commander, Eighth Coast Guard District
To: Distribution

Subj: CERTIFICATION OF MULTI-SERVICE OFFSHORE SUPPLY VESSELS (OSVs)

Ref: (a) Commandant (G-MOC) ltr 16711 dtd 25 November 1999

1. PURPOSE: This letter provides policy by which certain vessels may be designed, inspected, and certificated for service as an OSV under 46 CFR Subchapter L as well as for other services within the scope of 46 CFR Subchapter I (Cargo and Miscellaneous Vessels). Subsequent modifications of this letter may be developed to broaden its applicability to existing OSVs inspected under 46 CFR Subchapter I. This policy does not apply to any type of passenger vessel (Subchapters T, K or H) or to liftboats inspected under Subchapters I or L.

2. DISCUSSION:

a. Currently, OSVs have been restricted exclusively to support of the offshore oil and mineral industry. Increasingly, these vessels have requested changes in service to freight, industrial or towing vessels. Although the regulations allow for multi-service certification, OCMI's have been reluctant to issue a certificate, let alone two, without conducting an inspection each time the operator physically alters the vessel as it shifts from one service to the other. In fact, past practice has been to issue one certificate at a time for the appropriate service, thus creating an administrative and inspection burden each time a vessel changes service. Issuing a single Certificate of Inspection (COI) will allow more judicious use of Coast Guard resources, while at the same time ensuring public safety and facilitating industry. Reference (a) authorized the Eighth Coast Guard District to take the lead in developing a multi-service vessel certification policy. With the concurrence of Commandant (G-MOC), D8 (mvs) has developed this policy based on the input from a work group consisting of industry and Coast Guard representatives.

b. This policy letter is solely applicable to new OSVs built to 46 CFR Subchapter L standards which have a need to engage in both offshore supply service and various missions that are not in support of the offshore industry, such as the carriage of freight, industrial, or towing vessel service. As a general rule, multi-service vessels should be designed, built, and outfitted to the more stringent applicable standards of Subchapters L and I and applicable SOLAS requirements. This concept is the fundamental philosophical basis for multi-service certification of OSVs. Operational requirements imposed on the vessel will be dependent on the service the vessel is engaged in at that time (e.g. manning, carriage of certain cargoes, etc.). Under this policy, multi-service certification will only be available to vessels in the OSV and cargo and miscellaneous vessel categories.

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c. Multi-service certification is acceptable when the OCMI is reasonably satisfied that the vessel is constructed, maintained, and outfitted so as to be in compliance with the applicable regulations regardless of which service the vessel is in at any given time. With the vessels material condition and outfitting fixed, operating conditions, manning, and possibly total persons allowed may vary depending on the applicable regulations and can be addressed accordingly in a COI endorsement for the alternative service. The material condition and outfitting of the vessel should not normally be among the variables, otherwise the OCMI is put in a position of verifying compliance as changes are made.

d. This policy incorporates the following assumptions:

(1) Only one COI should be issued to each multi-service vessel.

(2) A multiple service vessel must conform at all times to the most stringent design and equipment standards of the applicable rules and regulations (including SOLAS if applicable). Operational requirements, such as manning, carriage of oil, licensing of crew, etc, will vary depending on actual vessel use.

(3) Conditions of operation for each service will be specified on the COI; therefore, additional inspections should not be required each time a change in service takes place. It is the responsibility of the vessel owner, operator, and master to ensure that the vessel is operated within the terms and conditions specified on its COI.

(4) User fees for multi-service certification will be based upon the service that results in assessment of the higher user fee amount.

e. This policy letter does not address the multi-service certification of existing OSVs built to the standards of 46 CFR Subchapter I. Although multi-service certification of these vessels is not prohibited by this policy, there are significant technical and regulatory issues associated with multi-service certification of existing OSVs certificated under 46 CFR Subchapter I. Possible readmeasurement of these existing Subchapter I OSVs seeking multi-service certification may be required due to loss of water ballast and other tonnage exemptions available exclusively to vessels engaged in OSV service. If the vessel's new tonnage is greater than 500 GT, the requirements of SOLAS (for vessels on international voyages) and the marine engineering and electrical regulations in 46 CFR Subchapters F & J will have to be carefully considered. That analysis is beyond the scope of this policy.

f. Currently, vessels inspected under 46 CFR Subchapter I are allowed to participate in the Alternative Compliance Program (ACP) while OSVs inspected under 46 CFR Subchapter L are not. The regulations at 46 CFR 8.400 through 8.450 and Change 1 to NVIC 2-95, "U.S. Coast Guard's Alternative Compliance Program," describe procedures for accepting certain plan review, and inspection functions performed by recognized classification societies. Regulations are expected to be proposed in the next few months to allow OSVs inspected under 46 CFR Subchapter L to participate in the ACP. After these regulations are finalized, plan review and

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inspection of multi-service vessels (under 46 CFR Subchapters I and L) may be conducted under the provisions of the ACP.

3. ACTION: Eighth district OCMI shall:

a. Use the guidelines provided by this policy letter to promote a consistent district wide approach to certification and operation of multi-service vessels.


b. Use the guidelines in enclosure (1) when evaluating multi-service certification of OSVs designed and built to the standards of 46 CFR Subchapter L.

c. Use the guidance in enclosure (2) when considering automation requirements for multi-service vessels.

d. Use the sample COI endorsements in enclosure (3) when developing COI endorsements for multi-service vessels.

e. Consider the table in enclosure (4) to help determine the differences between requirements of 46 CFR Subchapter L, I and SOLAS.

4. Equivalencies may be granted by Commander, Eighth Coast Guard District (m) in certain cases where it can be demonstrated that the safety of a vessel or its crew will not be affected by accepting an alternative standard. All such requests must be forwarded to the Eighth District via the cognizant OCMI who should provide an endorsement and recommendations.


R. J. MORRIS
By direction

Encl: (1) General guidance on multi-service certification of OSVs built to 46 CFR Subchapter L

(2) General Automation Considerations

(3) Sample Multi-Service Vessel COI Endorsements

(4) Comparison Table: 46 CFR Subchapter L, I and SOLAS

Dist: All Eighth District MSOs, MSU and MSDs

Copy: COMDT (G-MOC), (G-MSO), (G-MSE)
Marine Safety Center